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December 29, 2021

**Via ECF**

Hon. Margo K. Brodie  
U.S. District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: State Farm Mutual Automobile Ins. Co., et al. v. Metro Pain Specialists, et al,  
Civil Case No. 1:21-cv-05523 (MKB) (PK)

Dear Judge Brodie:

Our firm represents Defendants Metro Specialists Professional Corporation d/b/a Metro Pain Specialists (“Metro Pain”), Leonard Shapiro, M.D. (“Dr. Shapiro”) and Tri Borough NY Medical in the above-captioned matter. We are writing on our clients’ behalf to request a brief adjournment of the return date of Plaintiffs’ Motion for Preliminary Injunction until Tuesday January 17<sup>th</sup> from the current return date set by the Court which is January 4, 2022 (Docket No. 77).

We are requesting the extension because the two principal attorneys handling this matter for our firm, Peter Stroili and myself, are currently on vacation during the Christmas and New Year’s holidays and are not scheduled to return for to the office until January 3<sup>rd</sup>. It will also take a considerable amount of time to respond to the Motion for Preliminary Injunction (which includes a 25-page Memorandum of Law).

In accordance with Your Honor’s Rules, we note that counsel for the Plaintiffs have consented to the adjournment of the time for all Defendants to respond to the Motion and no previous requests for adjournment or enlargement of time have been requested in connection with this motion.

We appreciate the Court’s consideration of this request.

Very truly yours,

Kaufman Dolowich & Voluck, LLP

By: /s/ Kevin J. Windels  
Kevin J. Windels

cc: All counsel of record (via ECF)